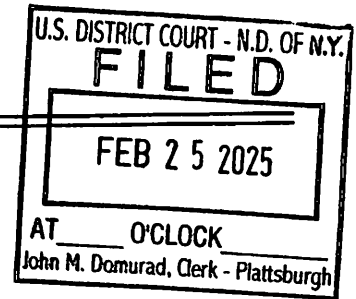


AO 91 (Rev. 11/11) Criminal Complaint



UNITED STATES DISTRICT COURT

for the

Northern District of New York

UNITED STATES OF AMERICA

v.

Carlos Daniel Quiroz-Duran

Case No. 8:25-MJ-46 (GLF)

Defendant.

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. On or about the date(s) of February 23, 2025, in the county of Clinton in the Northern District of New York, the defendant violated:

Code Section

8 U.S.C. § 1324(a)(1)(A)(ii)

Offense Description

Transport and move or attempt to transport and move one alien, knowing and in reckless disregard of the fact that the alien had come to, entered, and remained in the United States in violation of the law, by means of transportation or otherwise, in furtherance of the alien's violation of law.

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.

Complainant's signature

Alex J. Espinoza, Border Patrol Agent

Printed name and title

Attested to be the affiant in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure.

Date: February 25, 2025

City and State: Plattsburgh, NY

Hon. Gary L. Favro, U.S. Magistrate Judge

United States of America v. Quiroz-Duran

On February 23, 2025, at approximately 4:50 a.m., Swanton Sector Dispatch notified Champlain, New York Border Patrol Agents of one individual crossing the United States/ Canada international boundary one mile west of the Champlain Port of Entry. Agents responded to the area and located a vehicle abandoned on Perry Mills Road directly south of the location of the suspected illegal entry. Agents requested New York State Troopers respond as the vehicle was partially blocking the roadway. Agents observed footprints leaving the vehicle and heading northbound towards the last known location of the person making the suspected illegal entry.

At approximately 8:00 a.m., Agents encountered a man walking on Perry Mills Road and Agents questioned him as to his reason for being in the area. The man identified himself as Carlos QUIROZ-Duran, the same name listed as the registered owner of the abandoned vehicle previously located. The Agents were able to match the soles of his shoes as the shoeprints leaving the vehicle parked in the roadway. QUIROZ-Duran stated he was from Venezuela and currently living in Albany, New York. QUIROZ-Duran stated he attempted to walk north to look for someone but was unable to continue because of the depth of the snow. QUIROZ-Duran did not have any identification on him and he was transported to the Champlain Border Patrol Station for further investigation.

At the station, QUIROZ-Duran offered more information on the person he was searching for. QUIROZ-Duran stated he lost communication with a woman and mentioned she was not feeling well and could not go any further. Agents asked him to try and call her but the attempt was unsuccessful. After the failed attempt to reach her by phone QUIROZ-Duran provided Agents a more specific location where they could respond and search.

At the station Border Patrol Agent entered QUIROZ-Duran's biographical information and fingerprints into Department of Homeland Security databases. It was revealed that QUIROZ-Duran is a citizen of Venezuela. He was previously encountered by U.S. Border Patrol in Andrade, California on August 18, 2022, and processed as Warrant of Arrest/ Notice to Appear and released. QUIROZ-Duran's immigration court hearing was scheduled for August 18, 2022, in Chicago, Illinois. QUIROZ-Duran has a pending Asylum Claim without a scheduled hearing date.

At the station, QUIROZ-Duran was issued *Miranda* and agreed to speak with law enforcement. QUIROZ-Duran made the following admissions: QUIROZ-Duran stated he had come to the area to pick up a woman who is from the Dominican Republic who he did not know. He admitted to having been in contact with her and he had been guiding her. He had lost contact with her after she said she could not continue, and he felt guilty, so he went to look for her and that's when he was encountered by law enforcement. QUIROZ-Duran said he had financial difficulties and was put in contact with someone who would pay him \$1,300 for making this trip but he had not been paid yet. The woman was going to pay him through Zelle once he picked her up. QUIROZ-Duran further stated he erased communications on his phone with the person who arranged the smuggling attempt and the woman who was crossing when he saw immigration because he was scared.

Champlain Border Patrol Agents found and apprehended one female Dominican Republic national who had entered the United States unlawfully in the vicinity of where QUIROZ-Duran was first encountered and where he had indicated they should search.